

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re: \_\_\_\_\_ ) Chapter 11  
 )  
 )  
YELLOW CORPORATION, *et al.*,<sup>1</sup> ) Case No. 23-11069 (CTG)  
 ) (Jointly Administered)  
 )  
 )  
Debtors. ) Related Docket No. 2576

**JOINDER AND RESERVATION OF RIGHTS OF TEAMSTERS LOCAL 710  
TO THE INTERNATIONAL BROTHERHOOD OF TEAMSTERS RESPONSE  
TO DEBTORS' THIRD OMNIBUS (SUBSTANTIVE) OBJECTION  
TO PROOFS OF CLAIM FOR WARN LIABILITY]**

Teamsters Local 710 (“Local 710”), by and through its counsel, hereby files this Joinder and Reservation of Rights (the “Joinder”) to the International Brotherhood of Teamsters (“IBT”) Response to Debtors’ Third Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability (the “Response”) (D.I. 2778). In support of this Joinder, Local 710 respectfully states:

1. On August 6 and 7, 2023, the above-captioned debtors (the “Debtors”) filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.
2. On November 6, 2023, Local 710 filed two separate claims, numbered 3982 and 3983 (the “Claims”).
3. On March 12, 2024, the Debtors filed the *Debtors’ Third Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability* (the “Objection”) (D.I. 2576) requesting the Court enter an order disallowing certain claims, including the Claims.
4. On March 28, 2024, the IBT filed its Response to Debtors’ Third Omnibus (Substantive) Objection to Proofs of Claim for WARN Liability (D.I. 2778).

---

<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/case/yellowcorporation/info>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

5. Local 710 hereby joins in, supports, and incorporates herein by reference, the Response, and adopts the arguments in the Response as its own.

6. This Joinder is submitted without prejudice to, and with full reservation of, the Local 710's rights, claims, defenses, and remedies, including the right to supplement the Joinder or modify, amend, or withdraw this Joinder, to seek discovery, to raise additional arguments and to introduce evidence at any hearing related to the Objection, and without in any way limiting any other rights of Local 710 to respond to the Objection, on any grounds, as may be appropriate.

WHEREFORE, Local 710 respectfully requests that the Court overrule Debtors' Third Omnibus (Substantive) Objection to Proofs of Claim for Warn Liability.

Dated: March 29, 2024  
Wilmington, Delaware

**GELLERT SCALI BUSENKELL &  
BROWN LLC**

/s/ Michael Busenkell  
Michael Busenkell (DE 3933)  
1201 N. Orange St., Ste. 300  
Wilmington, DE 19801  
Telephone: (302) 425-5812  
Fax: (302) 425-5814  
mbusenkell@gsbblaw.com

-and-

**WILLIG, WILLAMS & DAVIDSON**

James S. Beall  
1845 Walnut Street, 24th Floor  
Philadelphia, PA 19103  
Telephone: (215) 656-3600  
Email: jbeall@wwdlaw.com

*Counsel to Teamster Local 710*